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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8  
9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 v.  
12 MAURICE WILLIAMSON II;  
13 Defendant.

Case No. 2:21-cr-00129-APG-EJY

**STIPULATION TO SEAL**  
(First Request)

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15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United  
16 States Attorney, and Joshua Brister, Assistant United States Attorney, counsel for the United  
17 States of America, and Yi Lin Zheng, counsel for Maurice Williamson II, that Mr. Williamson's  
18 sentencing memorandum and its accompanying exhibits be filed under seal.

19 The Stipulation is entered into for the following reasons:

20 1. "[T]he need to protect medical privacy qualifies as a 'compelling reason' for  
21 sealing records." Williams v. Mark, 2019 WL 5102470, No. 3:17-cv-335-MMD-WGC (D.  
22 Nev. Oct. 11, 2019).

23 2. Mr. Williamson's sentencing memorandum exhibits are Mr. Williamson's  
24 medical records from his hospitalization at Sunrise Hospital.

25 3. Mr. Williamson's sentencing memorandum quotes liberally from these medical  
26 records.

1           4.       Because Mr. Williamson's sentencing memorandum repeatedly highlights  
2 sensitive portions of his medical records, both the memorandum and the exhibits should be  
3 sealed.

4           This is the first stipulation to continue filed herein.

5           DATED: January 13, 2023.

6       By /s/ Yi Lin Zheng  
7       Yi Lin Zheng  
      Counsel for Maurice Williamson II

JASON FRIERSON  
United States Attorney

8                       By /s/ Joshua Brister  
9                       Joshua Brister  
10                      Assistant United States Attorney

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13       IT IS SO ORDERED:

14       Dated: January 17, 2023

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18                      ANDREW P. GORDON  
19                      UNITED STATES DISTRICT JUDGE  
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